

United States Bankruptcy Court
Eastern District of Pennsylvania

In re Idelfonso Rodriguez, Jr.

Debtor

Case No. **22-11814/amc**
Chapter **13**

US. BANK NATIONAL ASSOCIATION AS TRUSTEE
FOR THE PA HOUSING FINANCE AGENCY

Movant

:

vs.

IDELFONSO RODRIGUEZ, JR.

Debtor

CHAPTER 13 NO. 22-11814/amc

**RESPONSE TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY UNDER SECTION 362
OF US BANK NATIONAL ASSOCIATION AS TRUSTEE FOR THE PA HOUSING FINANCE
AGENCY**

1. Admittted.
2. Admitted.
3. Denied. The averments in this paragraph are a legal conclusion which no response is required.
4. Admitted.
5. Admitted.
6. Denied. It is specifically denied that Debtor has not made his post-petition mortgage payments from January of 2023 through April of 2023. To the contrary, debtor has made all of his post-petition mortgage payments.

7. Denied. The averments in this paragraph are a legal conclusion to which no response is required.
8. Denied. It is specifically denied that debtor is behind \$1,851.64 plus attorney's fees and costs.

Debtor has been making his post-petition mortgage payments.

9. Denied. The averments in this paragraph are a legal conclusion to which no response is required.
10. Denied. The averments in this paragraph are a legal conclusion to which no response is required.

WHEREFORE, Debtor requests that the Motion of U.S. Bank National Association as Trustee for the Pennsylvania Housing Finance Agency for Relief from the Automatic Stay Under Section 362 is denied.

/s/Bradly E. Allen, Esquire

Bradly E. Allen, Esquire

Attorney for Debtor

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P-215-725-4242

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In re: **Idelfonso Rodriguez, Jr.**) Case No. **22-11814/amc**
)
)
Debtor) Chapter **13**

ORDER

AND NOW, this day of , 2023 upon consideration of the Motion for Relief of U.S. Bank National Association as Trustee for the Pennsylvania Housing Finance Agency and Debtor's Response it is hereby;

ORDERED, that the Motion for Relief of U.S. Bank National Association as Trustee for the Pennsylvania Housing Finance Agency is denied.

HONORABLE ASHELY M. CHAN
U.S. BANKRUPTCY JUDGE